

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

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OCT 26 10 41 AM '98

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD REFERRAL: 98NF-12
DATE ACTIVATED: 9/11/98

STAFF MEMBERS: Mark Shonkwiler
Clinett Short

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Crowell & Moring PAC
and Karen Hastie Williams, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(i)

INTERNAL REPORTS CHECKED: Disclosure Reports
Referral Material

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on August 24, 1998. The basis of the referral is the failure of the Crowell & Moring PAC, and Karen Hastie Williams, as treasurer, to file timely its 1998 April Quarterly Report during the 1997-1998 election cycle.

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends the Commission find reason to believe Respondents violated 2 U.S.C. § 434(a)(4)(A)(i).

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99 "04 "391 "01 "34

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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54710"162"40"66

IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the Crowell & Moring PAC and Karen Hastie Williams, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis and conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

10/26/98
Date

BY: [Signature]
Lois G. Lerner
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed agreement

99.04.391.0176